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Dee May
Director
Federal Regulatory Affairs

November 5, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ex Parte

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CC Docket No. 99-295: In the Matter of Application of Bell Atlantic Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in New York

Dear Ms. Salas,

At the request of the Common Carrier Bureau Policy Division, Bell Atlantic met with representatives of the CCB yesterday to address their questions regarding the Bell Atlantic Change Management process and related information that was filed in our New York Long Distance Application. Representing Bell Atlantic were Karen Zacharia, Marion Jordan and me. Representing the Policy Division was Jessica Rosenworcel and Johanna Mikes. Materials used at the meeting are attached.

As outlined in the Public Notice (DA-99-2014) issued by the FCC on September 29, 1999, the 20 page ex parte limit does not apply to this ex parte since Bell Atlantic is responding to direct questions raised by Commission staff and reviewed material addressed in our original application. The page limitation also does not apply to the material attached because it was used during the ex parte meeting to facilitate discussion.

Please feel free to contact me with any questions.

Sincerely,

Dee May

Attachments

cc: A. Kearney
J. Rosenworcel
J. Mikes

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Bell Atlantic
Change Management

November 4, 1999

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Change Management

- The Change Management Process was originally developed with the CLECs as part of the NY collaborative process in May, 1998.
  - The process is now used throughout the region.
- The process addresses timelines and documentation requirements for new software releases.
  - Type 1 (Emergency/Maintenance) Corrects problem discovered in production version of an application interface. Either BA or the CLEC may initiate.
  - Type 2 (Regulatory) Change to an application interface mandated by regulatory agencies such as the FCC or state PSCs.
  - Type 3 (Industry Standard) Changes required to update these systems to new telecommunications industry standards.
  - Type 4 (BA Originated) Enhancements initiated by BA.
  - Type 5 (CLEC Originated) Enhancements initiated by a CLEC.

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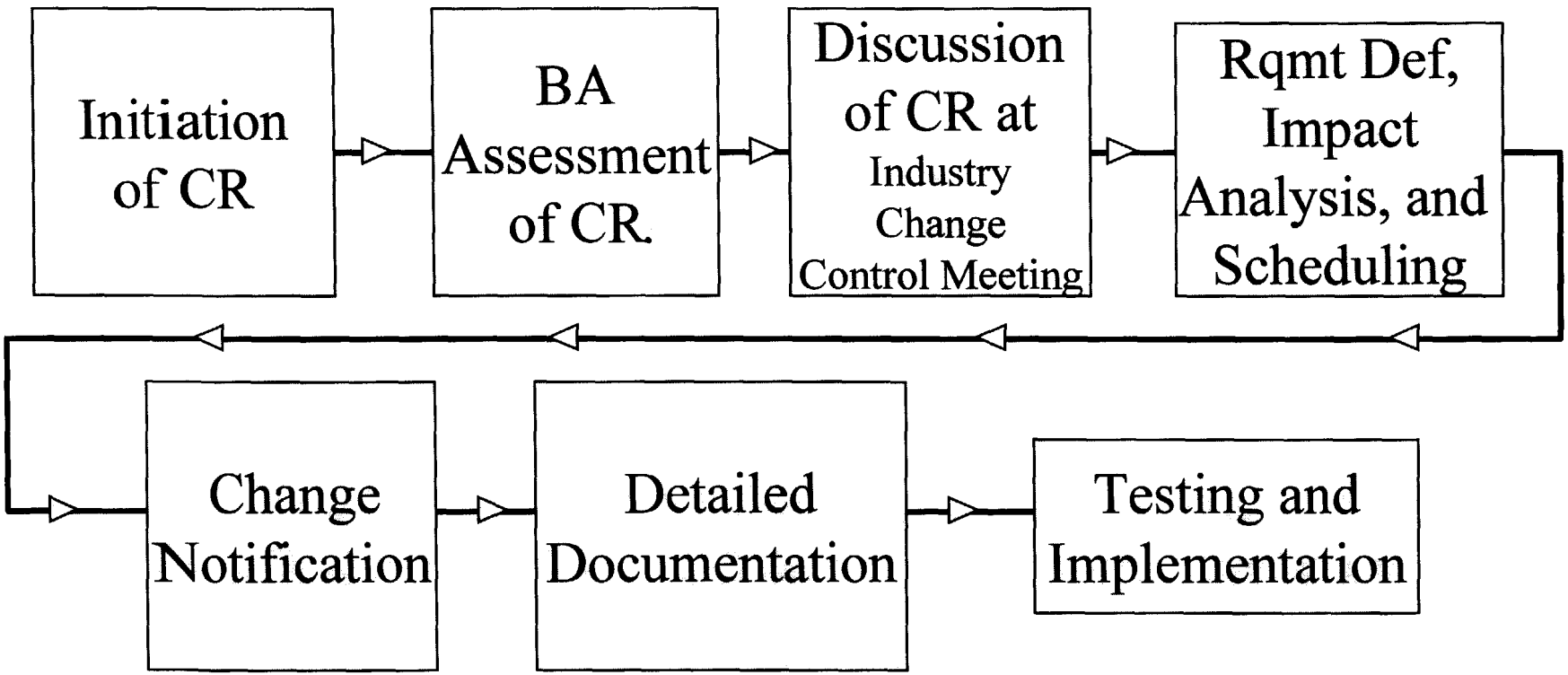
Process

The following is a high-level Process flow for the lifecycle of a typical CR.



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Type 1 Notification Process

- Worked with CLECs to address concerns:
  - Frequency and use of flash announcements
  - Pager notification
  - Content of announcements
- Conducted beta test of new process with two CLECs in July. Implemented for all CLECs on August 31st. New process defines:
  - Notification Timelines
  - CLEC conference call held to discuss software fixes before implementation
- Held evaluation with CLECs in October and agreed on additional modifications.
  - Separate bulletins for software fixes and interface outages.
  - New procedures documented and distributed October 25th.

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CLEC Communication

- Industry Meetings
  - Monthly Industry Change Control Meetings are held to discuss Change Requests, upcoming releases, and general information. For each meeting BA provides the agenda, upcoming meeting schedule, discussion topics from the previous meeting, roll-up of the previous months activities, Change Request information including status and system planning forecasts.
  - Workshops: Meetings with CLECs to discuss specific topics such as prioritization of Change Requests, Change Request timelines, notification processes, Flash Announcements, etc.
  - Prioritization sessions recently held to review all Type 4 and 5 Change Requests.
    - 14 open Type 5 Change Requests (5 opened since September)
    - 2 of top 5 priorities and 4 of top 10 priorities are CLEC initiated (Type 5)

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Communication (cont.)

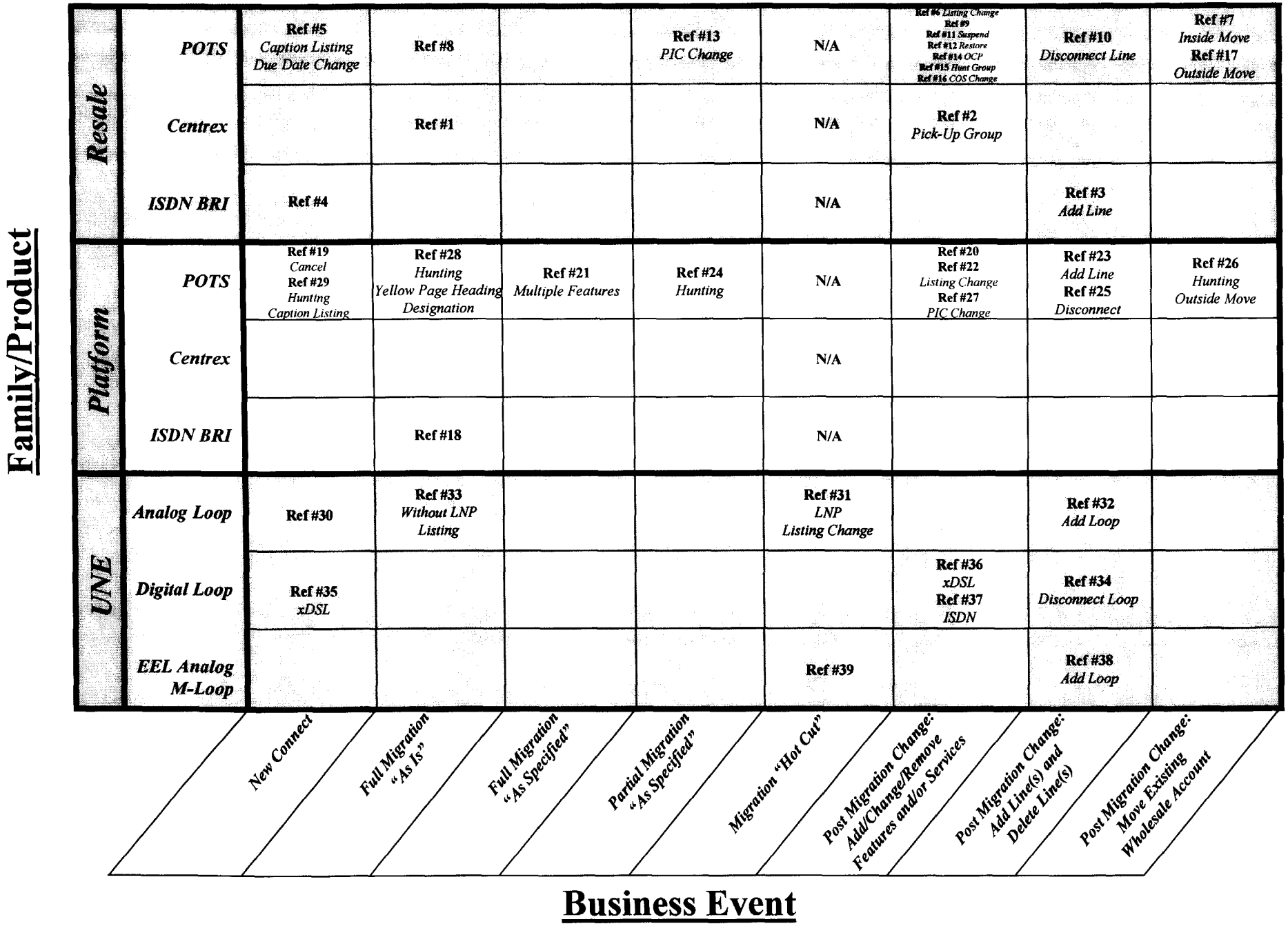
- Documentation Distributions
  - Ensure timely distribution of the documentation related to each CLEC-affecting Change Request. Include Change Notification and Change Confirmation as specified in the Industry Change Control Agreement.
  - Responses to miscellaneous industry questions posed to Bell Atlantic.
  - Carrier-to-Carrier metrics have been developed specific to Change Management to ensure that timely and accurate communication for Change Requests are being provided to the industry.

- Web Site Postings
  - The BA TIS Web Site (http://www.bellatlantic.com/tis/) contains LSR business rules, EDI specifications, FLASH Announcements/Type 1 Bulletins, Industry Change Control Meeting materials, and other documentation.
- A Change Request database is used to track status.
- Formal escalation procedures are in place sanctioned by the NY PSC.

October 1999 Regression Test Deck - Pre-Order Scenarios

	Scenario
TN Reservation through PREMIS	Reserve a single TN Exchange a TN that is currently reserved, for another one Return a specific TN from reservation
Due Date Availability (DDA)	Select a due date
Product Service Availability/Allowability (PSA)	Perform a Product Service Availability Inquiry
Address Validation through PREMIS	Validate Address by using the full address as the input for the transaction Validate Address by using a partial address as the input for the transaction Validate an Address by using a TN as the input for the transaction
Address Validation through LiveWire	Validate address using partial address as the input (Direct) Validate address using partial address as the input (Conversational)
Directory Listings Request (DLR)	Request a Directory Listing for a Business Multi-line Listing Request a Directory Listing using a TN for a residence Request a Directory Listing using an exact match for a name Request a Caption Header by abbreviated name
Loop Qualification - Basic (LQB)	Perform a loop qualification transaction for a Basic Loop
Customer Service Record (CSR) Retrieval	Retrieve a parsed CSR for a Retail customer Retrieve a non-parsed CSR for a Retail customer Retrieve a parsed CSR for a Resale customer Retrieve a non-parsed CSR for a Resale customer
CABS Customer Service Record (CCSR) Retrieval	Retrieve a non-parsed CCSR for a UNE customer

October 1999 Regression Test Deck - Order Scenarios



Bell Atlantic
CLEC Testing Summary

November 4, 1999

CLEC Testing

Bell Atlantic supports CLEC Testing for New Release and New Entrant Testing.

- New Release Testing enables CLECs to test new release code prior to production.

- New Entrant Testing includes CLECs that are new to the wholesale business or are testing a new area of wholesale functionality (e.g., Resale, Platform, UNE).

- This testing is supported through a dedicated physical environment, written procedures, and dedicated personnel.

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Dedicated CLEC Test Environment (CTE)

- In May, BA-NY implemented a CLEC Test environment by reserving one week prior to the release for CLEC testing of pre-order and order functionality.
  - Stable environment, mirror of production.
  - Production ready code.
  - Environment was used for testing in May, June and August releases.
- In mid-September, BA-NY implemented the CLEC Test Environment as a separate physical environment.
  - The environment mirrors production.
  - Code is migrated to the environment one month prior to the release and following Bell Atlantic's integration testing. This provides the CLECs with a full month to test production ready code.
  - 4 CLECs tested in the new environment

Procedures and Dedicated Support

- Bell Atlantic has developed comprehensive CLEC Testing procedures to ensure a quality test approach.
  - Scheduled bug fixes (Wednesday nights)
  - Status calls
  - Test deck execution schedule
- Bell Atlantic provides dedicated test coordinators to assist CLECs in the customized development and execution of a test plan.
  - Each test coordinator is assigned to support specific CLECs.
  - Test coordinators facilitate issue resolution.
    - Coach CLECs on input/data errors.
    - Refer code defects to application team for resolution.

Test Decks

- Bell Atlantic develops and maintains the Quality Baseline Validation Test Deck.
  - Test Deck contains typical wholesale Pre-Ordering and Ordering scenarios (see Appendix).
    - Pre-Order scenarios include EDI request and EDI response.
    - Order scenarios include EDI input, EDI output, Local Service Request (LSR), Local Service Confirmation (LSC), Provisioning Completion Notice (PCN), and Billing Completion Notice (CMP).
  - This Test Deck is run before the CTE environment is opened for CLEC testing, at the conclusion of the CLEC test, and in production immediately following the release. This demonstrates that the CTE environment is ready for CLEC testing, that any software bug fixes have been successfully implemented before migrating to production, and that the software was successfully migrated to production.
- Bell Atlantic also develops a Quality Progression Test Deck as needed.
  - The Progression Test Deck covers test scenarios for significant changes in functionality. If an application release does not contain significant CLEC impacting functionality, a Progression Test Deck will not be developed.
- Bell Atlantic establishes test accounts for the test deck and to meet unique CLEC requirements.
  - Bell Atlantic will review each testing scenario and determine a test account to be used.
  - If new test accounts are required, Bell Atlantic will build them and provide the CLEC with the necessary account information.
- CLECS are encouraged to develop and execute their own test scenarios.

New Entrant Testing

Bell Atlantic works with CLECs to develop and execute a comprehensive test plan.

- Test Planning
  - Bell Atlantic meets with the CLEC to discuss types of transactions the CLEC will be using to assist in determining what scenarios are needed.
  - The CLEC may use scenarios in the test deck and/or develop new scenarios.
  - Scenarios will be grouped into logical phases.
  - CLEC and Bell Atlantic will develop a schedule for the test that will be reviewed on a regular basis.
- Test Execution
  - Bell Atlantic will provide dedicated test coordinators during execution of the test
  - CLEC and/or Bell Atlantic will track issues arising during the test with the status of each open issue being reviewed on a regular basis.
  - Entrance/exit criteria will be established for each phase of testing
    - Connectivity test phase - the ability of the CLEC and Bell Atlantic to successfully pass and receive information across the interface
    - Transaction testing - the successful completion of the transaction including proper responses being returned to the CLEC
  - Friendly Production - the CLEC will submit production transactions.

Appendix:
Regression Test Deck Summary

Pre-Ordering North

CLEC
LOCAL SERVICE
PRE-ORDERING

WEB
GUI
OR
EDI 9

GATEWAY
SYSTEMS
(DCAS, DCF)

PREMIS
- Service Address Validation
- Telephone Number Selection

WFA
- Service Installation Status

CRIS/CABS
- Customer Service Record
  - Billing Address Verification
  - Account Telephone Number

DOE
- Product & Service Availability/ Allowability
  - Directory Close Dates
  - Carrier List
  - Switch Features

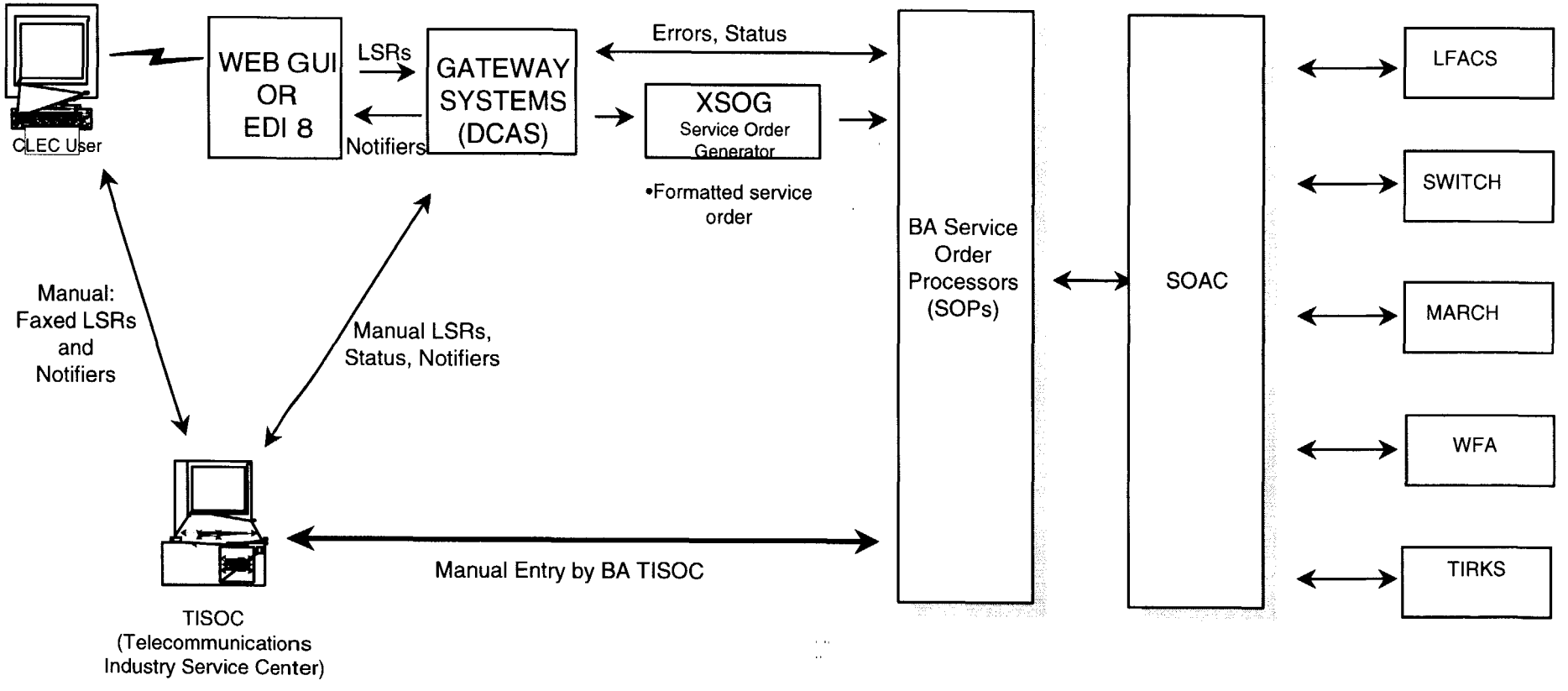
SOP
- Due Date Availability
- Service Order

ATLAS
- Directory Listing

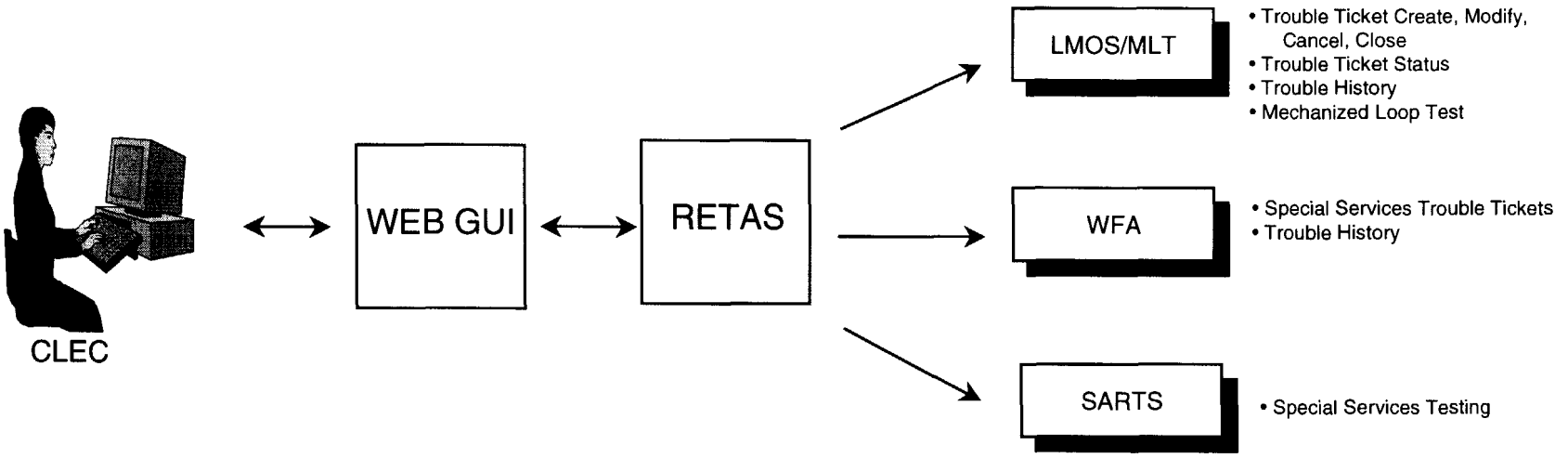
PHOENIX

LFACS
- ISDN Loop Qualification
  - Basic & Extended

Ordering & Provisioning - North



Maintenance & Repair - North



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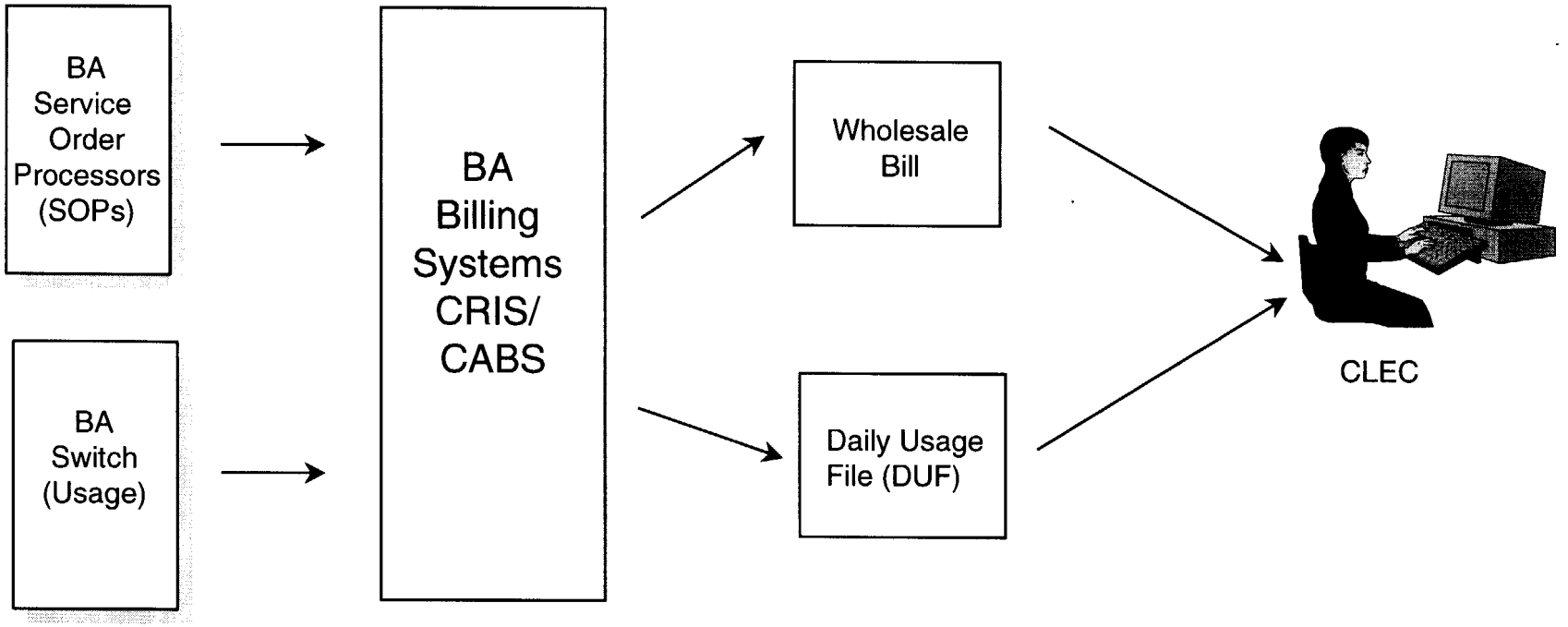
Billing - North